## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE

GLOBAL FORCE,	)
ENTERTAINMENT, INC. and	)
JEFFREY JARRET	
Plaintiff,	) CIVIL ACTION NO. 3:18-cv-00749
v.	) CHIEF JUDGE CRENSHAW
ANTHEM SPORTS & ENTERTAINMENT	) ) MAGISTRATE JUDGE BROWN
CORP. and ANTHEM WRESTLING	)
EXHIBITIONS, LLC,	) JURY DEMAND
)	)
Defendants.	)

## PLAINTIFF'S MOTION TO COMPEL

Plaintiffs Global Force Entertainment, Inc ("GFE") and Jeffrey Jarrett (collectively "Plaintiffs"), pursuant to Fed. R. Civ. P. 37 and Local Rule 37.01, respectfully move the Court to compel Defendants to produce documents responsive to Plaintiffs' Requests for Production Nos. 13 and 14.

Defendants have refused to provide documents responsive to Request for Production Nos. 13 and 14 due to alleged contractual obligations owed to third parties that bar disclosure without an Order requiring disclosure. A true and correct copy of Defendants' responses to the Requests and pertinent correspondence<sup>1</sup> between counsel for the parties are attached hereto as <u>Exhibit 1</u> and <u>2</u> respectively. Defendants have voiced no objection as to the relevancy, proportionality, or scope of these requests. <u>Exhibits 1</u> and <u>2</u>. This Motion simply seeks the Order required by Defendants

<sup>&</sup>lt;sup>1</sup> Irrelevant portions of the communications are redacted.

mandating they produce responsive documents so the parties may continue with discovery. Plaintiffs do not request fees, costs, or any other sanction in association with this Motion.

WHEREFORE, Plaintiffs respectfully request an Order compelling Defendants to produce documents responsive to Requests for Production Nos. 13 and 14.

Respectfully submitted,

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Attorneys for Plaintiff Louisiana-Pacific Corporation

## **LOCAL RULE 37.01(b)(2) CERTIFICATION**

The undersigned hereby certifies that a meet and confer with opposing counsel was requested on January 28, 2019 in a good faith effort to resolve by agreement the issues raised in the above Motion to Compel. The request was denied by Defendants, stating it would be unproductive because they are required to keep the responsive documents confidential except pursuant to a Court Order. For the same reason, no joint statement is filed herewith.

/s/ Samuel F. Miller Samuel F. Miller

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of February 2019, the foregoing document was served via the Court's CM/ECF system upon the following:

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/s/ A. Grace Van Dyke James
A. Grace Van Dyke James